

February 22, 2002

Mr. Daniel O'Connor
Keihin IPT Manufacturing, Inc.
400 West New Road
Greenfield, IN 46140

Re: **059-15367-00013**
Third Minor Permit Revision to
FESOP 059-9160-00013

Dear Mr. O'Connor:

Keihin IPT Manufacturing, Inc. was issued a permit on May 28, 1998 for a stationary automotive components manufacturing operation. A letter requesting changes to this permit was received on December 21, 2001. Pursuant to the provisions of 326 IAC 2-8-11.1(d)(4)(A) and (D), a minor permit revision to this permit is hereby approved as described in the attached Technical Support Document.

Keihin IPT Manufacturing, Inc. has submitted a request to add one (1) mineral spirits unit and three (3) core knockout machines.

The proposed modification shall be incorporated into the existing source FESOP via a minor permit revision pursuant to 326 IAC 2-8-11.1(d)(4)(A) and (D) which states a modification with PM or PM10 potential to emit greater than or equal to 5 tons per year but less than 25 tons/yr, and VOC emissions greater than 10 tons per year, but less than 25 tons per year, shall be incorporated into the permit via a minor permit revision.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Fulton, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Scott Fulton or extension (3-5691), or dial (317) 233-5691.

Sincerely,

Original Signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

SDF

cc: File - Hancock County
U.S. EPA, Region V
Hancock County Health Department
Air Compliance Section Inspector - Warren Greiling
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR QUALITY

**Keihin IPT Manufacturing, Inc.
400 West New Road
Greenfield, Indiana 46140**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F059-9160-00013	Date Issued: May 29, 1998
First Minor Permit Modification 059-10290-00013	Date Issued: March 22, 1999
First Administrative Amendment 059-11071-00013	Date Issued: July 21, 1999
Second Administrative Amendment 059-11181-00013	Date Issued: October 1, 1999
First Significant Permit Revision 059-11634-00013	Date Issued: March 22, 2000
Third Administrative Amendment 059-11862-00013	Date Issued: March 20, 2000
Fourth Administrative Amendment 059-12650-00013	Date Issued: October 13, 2000
Fifth Administrative Amendment 059-14033-00013	Date Issued: April 24, 2001
Sixth Administrative Amendment 059-14237-00013	Date Issued: July 18, 2001
Second Minor Permit Revision No.: F059-14848-00013	Date Issued: November 8, 2001
Third Minor Permit Revision No.: F059-15367-00013	Affected Pages: 5 and 27
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issued: February 22, 2002

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary automotive components manufacturing operation.

Responsible Official: Larry Phillippo
Source Address: 400 West New Road, Greenfield, Indiana 46140
Mailing Address: 400 West New Road, Greenfield, Indiana 46140
SIC Code: 3714
County Location: Hancock
County Status: Attainment for all criteria pollutants
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD Rules;

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (1) Eight (8) aluminum furnaces, identified as Unit 1, with a maximum capacity of 3,238 pounds of aluminum ingots and flux per hour, using a wet scrubber as control, exhausting to one (1) stack (EF-48);
- (2) Fifteen (15) shell core sand molding machines, twenty (20) aluminum casting machines, one (1) die maintenance area, thirteen (13) core knockout machines, and one (1) uncontrolled small tertiary knockout machine, identified as Unit 2, with a maximum capacity of 4,857 pounds of aluminum and sand per hour, with the sand molding machines, aluminum casting machines and the die maintenance area controlled by three (3) baghouses, exhausting to three (3) stacks (EF-49, EF-101, and EF-107), and with the thirteen (13) core knockout machines controlled by thirteen (13) dust collectors;
- (3) One (1) throttle body shotblast, identified as Unit 3, with maximum capacity of 10,000 pounds of Zinc Shot per year, which exhausts inside the plant;
- (4) Mineral sprits machining and washing operations, identified as Unit 4, using one (1) Durr thermal oxidizer as control;
- (5) Machining operations, identified as Unit 5, using a mist collector as control, exhausting to one (1) stack (EF-44);
- (6) One (1) Electronic Control Unit (ECU) assembly operation, consisting of solder, resin and assembly operations, identified as Unit 6;
- (7) One (1) Electronic Control Unit (ECU) maintenance operation, consisting of cleaning and repairing operations, identified as Unit 7; and
- (8) One (1) maintenance and production cleaning operation, identified as Unit 8.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) One (1) 6.0 million British thermal units per hour (mmBtu/hr) natural gas fired boiler;

SECTION D.1 FACILITY OPERATION CONDITIONS

- (1) Eight (8) aluminum furnaces, identified as Unit 1, with a maximum capacity of 3,238 pounds of aluminum ingots and flux per hour, using a wet scrubber as control, exhausting to one (1) stack (EF-48);
- (2) Fifteen (15) shell core sand molding machines, twenty (20) aluminum casting machines, one (1) die maintenance area, thirteen (13) core knockout machines, and one (1) uncontrolled small tertiary knockout machine, identified as Unit 2, with a maximum capacity of 4,857 pounds of aluminum and sand per hour, with the sand molding machines, aluminum casting machines and the die maintenance area controlled by three (3) baghouses, exhausting to three (3) stacks (EF-49, EF-101, and EF-107), and with the thirteen (13) core knockout machines controlled by thirteen (13) dust collectors;
- (3) One (1) throttle body shotblast, identified as Unit 3, with maximum capacity of 10,000 pounds of Zinc Shot per year, which exhausts through stack EF-117;

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2 (Process Operations):

- (a) The particulate matter (PM) emissions from the eight (8) aluminum furnaces (Unit 1) shall be limited to 5.66 pounds per hour.
- (b) The particulate matter (PM) emissions from the fifteen (5) shell core sand molding machines, twenty (20) aluminum casting machines, one (1) die maintenance area, ten (10) core knockout machines and one (1) uncontrolled small tertiary knockout machine (Unit 2) shall be limited to 7.4 pounds per hour, and
- (c) The particulate matter (PM) emissions from the one (1) throttle body shotblast (Unit 3) shall be limited as established in the following equation:

These limits are based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.1.2 Aluminum Processing Requirements

The metal processed at the eight (1) furnaces of Unit 1 shall be clean aluminum only.

For the purposes of this Condition, clean aluminum is defined as:

- (a) molten aluminum,
- (b) T-bar,
- (c) sow,
- (d) ingot,

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Minor Permit Revision to a Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name: Keihin IPT Manufacturing, Inc.
Source Location: 400 West New Road, Greenfield, Indiana 46140
County: Hancock
SIC Code: 3714
Minor Permit Revision No.: 059-15367-00013
Permit Reviewer: SDF

The Office of Air Quality (OAQ) has reviewed an application from Keihin IPT Manufacturing, Inc. relating to the addition of one new mineral spirits unit and three core knockout machines to their existing stationary automotive components manufacturing operation.

Request

On December 21, 2001, Keihin IPT Manufacturing, Inc. submitted an application to add one new mineral spirits unit and three core knockout machines to their existing stationary automotive components manufacturing operation.

The addition of the units will allow the installation of a new production line that will allow Keihin IPT to produce types of parts that are not currently being produced. The maximum metal production will still be 2,312 pounds of aluminum per hour.

Although the hourly production rate is limited, the hours of operation are not, which means there may be an increase in the amount of metal produced over time which will result in an increase in actual emissions, which is considered increased utilization. Copies of the guidance and supporting EPA memos have been included as an attachment to this TSD.

To account for the emissions associated with increased utilization, the existing source emissions were estimated, the annual increase in amount of metal produced was determined, the fraction of increase in production due to the proposed equipment determined, and, utilizing the fraction of increase and the estimated source emissions, the emissions increase from the existing equipment due to increased utilization was estimated.

The proposed mineral spirits unit and core knockout machines will be identical to the mineral spirits units and core knockout machines that currently exist, the changes to the permit that are required to accommodate the changes proposed by Keihin IPT consist solely of changes to the source descriptions, and there will be no new applicable requirements.

Since the PM and PM10 unrestricted potential to emit (UPTE) exceed 5 tons per year but are less than 25 tons per year, and the VOC emissions exceed 10 tons per year, but are less than 25 tons per year, this proposed modification shall be incorporated into the existing source FESOP via a minor permit revision pursuant to 326 IAC 2-8-11.1(d)(4)(A) and (D) which states a modification with PM or PM10 potential to emit greater than or equal to 5 tons per year but less than 25 tons/yr, and VOC emissions greater than 10 tons per year, but less than 25 tons per year, shall be incorporated into the permit via a minor permit revision.

Existing Approvals

The source was issued a Federally Enforceable State Operating Permit (FESOP), F059-9160-00013, on May 29, 1998. Since issuance, the following changes to the FESOP have been approved:

(1)	059-10290-00013	First Minor Permit Revision	Date Issued:	03-22-99
(2)	059-11071-00013	First Administrative Amendment	Date Issued:	07-21-99
(3)	059-11181-00013	Second Administrative Amendment	Date Issued:	10-01-99
(4)	059-11634-00013	First Significant Permit Revision	Date Issued:	03-22-00
(5)	059-11862-00013	Third Administrative Amendment	Date Issued:	03-20-00
(6)	059-12650-00013	Fourth Administrative Amendment	Date Issued:	10-13-00
(7)	059-14033-00013	Name Change	Date Issued:	04-24-01
(8)	059-14237-00013	Fifth Administrative Amendment	Date Issued:	07-18-01
(9)	059-14848-00013	Second Minor Permit Revision	Date Issued:	11-08-01

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that this minor Permit Revision be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application.

Emission Calculations

UNRESTRICTED POTENTIAL TO EMIT DUE TO THE MODIFICATION:

The emissions generated by the proposed surface coating operation are VOC's, PM, and PM10 due to the new proposed equipment and increases in emissions due to increased utilization. The following calculations determine the unrestricted potential to emit from the proposed modification.

Mineral Spirits Unit:

The mineral spirits unit generates VOC emissions. The proposed unit will not generate any HAP emissions. The following calculations determine the VOC UPTE based on a maximum potential solvent usage of 5,000 gallons per year, use of the worst case solvent, the chemical properties of the solvent as obtained from the MSDS, emissions before controls, and 8760 hours of operation.

$$\text{tons VOC/yr} = 6.67 \text{ lb/gal} * 1.00 \text{ (fraction VOC)} * 5000 \text{ gal/yr} * 1/2000 \text{ ton/lb} = 16.67 \text{ tons/yr}$$

Core Knockout Machines:

The core knockout machines generate PM and PM10 emissions. The following calculations determine the PM/PM10 UPTE based on an emission factor of 98.63 lb/day, a control efficiency of 99%, 365 days of operation, and emissions before controls.

$$\text{tons PM/yr} = 98.63 \text{ lb/day} * 365 \text{ day/yr} * 1/2000 \text{ ton/lb} = 18 \text{ tons/yr}$$

PM10 is determined to be equal to PM.

Emissions Due to Increased Utilization:

The following calculations determine the emissions due to increased utilization based on the existing source emissions, the maximum hourly allowable metal production rate, the hourly increase in amount of metal produced, and the fraction of increase in production due to the proposed equipment determined.

Existing Potential Emissions:

The following table lists the source potential emissions as estimated in the original permits.

Number	Level	Issued	PM ton/yr	PM10 ton/yr	SO2 ton/yr	NOx ton/yr	VOC ton/yr	CO ton/yr	S* HAP ton/yr	C** HAP ton/yr
(30) 1723	CP	12-14-88	5.00	5.00	-	3.00	132.00	1.00	-	-
None	Reg.	12-13-89	5.80	5.80	neg.	neg.	neg.	neg.	neg.	neg.
2451	Reg.	06-02-92	6.20	3.80	1.30	1.10	0.29	neg.	neg.	neg.
3506	Exmpt	03-21-94	-	-	-	-	0.01	-	neg.	neg.
5161	Reg.	02-12-96	14.20	14.20	1.20	2.10	2.65	0.20	-	-
8152	Reg.	02-28-97	0.10	0.10	-	0.90	9.80	0.20	neg.	neg.
9162	FESOP	05-29-98	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
10290	1 st MPR	03-22-99	15.31	15.31	-	-	-	-	-	-
11071	1 st AA	07-21-99	-	-	-	-	9.23	-	-	-
11181	2 nd AA	10-01-99	-	-	-	-	-	-	-	-
11634	1 st SPR	03-22-00	-	-	-	-	-	-	-	-
11862	3 rd AA	03-20-00	0.26	0.19	-	-	-	-	-	-
12650	4 th AA	10-13-00	-	-	-	-	-	-	-	-
14033	5 th AA	04-24-01	-	-	-	-	-	-	-	-
14237	6 th AA	07-18-01	7.80	7.80	-	-	-	-	-	-
14848	2 nd MPR	11-08-01	22.60	22.60	-	-	-	-	-	-
Total			77.27	74.80	2.50	7.10	153.98	1.40	neg.	neg.

* S = Single HAP

** C = Combined HAP

Hours of Operation that Could Be Available for Increased Utilization:

The source operates 24 hours per day, 5 days a week. Therefore, the amount of hours available for increased utilization are 2496 hours per year.

$$2 \text{ day/wk} * 24 \text{ hr/day} * 52 \text{ wk/yr} = 2496 \text{ hr/yr}$$

The Annual Potential Increased Amount of Metal Due to Increased Utilization:

Based on the annual hours of operation that are available for increased utilization (2496 hr/yr), the estimated amount of metal that could be produced due to increased utilization is 786,240 lb metal/yr.

105 lb metal/hr knockout machine * 3 knockout machines = 315 lb metal/hr
315 lb metal/hr * 2496 hr/yr = 786,240 lb metal/yr

Fraction Increase Due to the Proposed Equipment:

The estimated fraction of increase in metal production that could be produced at the proposed equipment is determine to be 0.05.

2312 lb metal/hr * 6240 hr/yr = 14,426,880 lb metal/yr

Fraction of Existing Metal Produced = [786,240 lb metal/yr] / [14,426,880 lb metal/yr] = 0.05

Increase in Emissions Due to Increased Utilization:

Based on this fraction increase in metal and the existing source emissions, the estimated increases from the existing units based on increased utilization is determined as follows. The existing emissions used are all production equipment and combustion units. The mineral spirits units are not included because the increased fraction of metal will be processed by the proposed mineral spirits unit.

0.05 * Estimated Existing Source Potential Emissions = Increase in Emissions Due to Increased Utilization

	PM ton/yr	PM10 ton/yr	SO2 ton/yr	NOx ton/yr	VOC ton/yr	CO ton/yr	S* HAP ton/yr	C** HAP ton/yr
Increase in Emissions Due to Increased Utilization	3.86	3.76	0.13	0.36	1.10	0.07	neg.	neg.

* S = Single HAP

** C = Combined HAP

EMISSIONS AFTER CONTROLS FROM THE PROPOSED EQUIPMENT:

The PM/PM10 and VOC emissions are controlled. The following calculations determine the emissions after controls.

VOC:

The VOC emissions from the mineral spirits unit are controlled by a thermal oxidizer with an overall control efficiency of 85%.

The following calculations determine the emissions after controls from the mineral spirits unit based on the estimated emissions before controls, a design control efficiency of 85%, and 8760 hours of operation.

VOC Emissions Before Controls (16.67 tons/yr) * (1 - 0.85) = 2.50 tons (PM/PM10)/yr

PM:

The emissions from the 3 knockout machines are controlled by 3 identical individual baghouses, each with a design control efficiency of 99%.
The following calculations determine the emissions after controls from the knockout machines based on the estimated emissions before controls, a design control efficiency of 99%, and 8760 hours of operation.

$$\text{PM/PM}_{10} \text{ Emissions Before Controls (18 tons/yr)} * (1 - 0.99) = 0.18 \text{ ton (PM/PM}_{10}\text{)/yr}$$

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.”

This table reflects the PTE before controls due to the proposed modification based on the above estimated emissions calculations. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	21.86
PM-10	21.74
SO ₂	0.13
VOC	17.77
CO	0.07
NO _x	0.36

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

Pollutant	Potential To Emit (tons/year)
Single HAP	neg.
Total Combined HAPs	neg.

This proposed modification shall be incorporated into the existing source FESOP via a minor permit revision pursuant to 326 IAC 2-8-11.1(d)(4)(A) and (D) which states a modification with PM or PM₁₀ potential to emit greater than or equal to 5 tons per year but less than 25 tons/yr, and VOC emissions greater than 10 tons per year, but less than 25 tons per year, shall be incorporated into the permit via a minor permit revision.

County Attainment Status

The source is located in Hancock County.

Pollutant	Status
PM ₁₀	Attainment or Unclassifiable
SO ₂	Attainment or Unclassifiable
NO ₂	Attainment or Unclassifiable
Ozone	Attainment or Unclassifiable

CO	Attainment or unclassifiable
Lead	Attainment or unclassifiable

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Hancock County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Hancock County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, all other criteria pollutants were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Existing Source Status

Existing Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Ind. HAP (tons/yr)	Comb. HAPs (tons/yr)
Source Emissions	<100	<100	<100	<100	<100	<100	<10	<25
PSD Levels	250	250	250	250	250	250	-	-
Part 70 Levels	-	100	100	100	100	100	10	25

- (a) The existing source is not a major PSD stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more and it is not one of the 28 listed source categories.
- (b) The existing source is not a Title V major stationary source because no source criteria pollutant potential to emit (PTE) exceeds the applicable level of 100 tons/yr, no single hazardous air pollutant PTE exceeds the applicable level of 10 tons/yr, and the combined hazardous air pollutant PTE does not exceed the applicable level of 25 tons/yr.

Existing Source Status After the Proposed Modification:

Existing Source PSD Definition (emissions after controls, after the proposed modification, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Ind. HAP (tons/yr)	Comb. HAPs (tons/yr)
Source Emissions	<100	<100	<100	<100	<100	<100	<10	<25
PSD Levels	250	250	250	250	250	250	-	-
Part 70 Levels	-	100	100	100	100	100	10	25

- (a) The existing source after the proposed modification is not a major PSD stationary source

because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more and it is not one of the 28 listed source categories.

- (b) The existing source after the proposed modification is not a Title V major stationary source because no source criteria pollutant potential to emit (PTE) after the modification exceeds the applicable level of 100 tons/yr, no single hazardous air pollutant PTE after the modification exceeds the applicable level of 10 tons/yr, and the combined hazardous air pollutant PTE of the proposed modification does not exceed the applicable level of 25 tons/yr.

Federal Rule Applicability

New Source Performance Standards (NSPS):

There are no New Source Performance Standards (326 IAC 12 and 40 CFR Part 60) that become applicable due to the proposed modification.

National Emission Standards for Hazardous Air Pollutants (NESHAPs):

There are no National Emission Standards for Hazardous Air Pollutants (326 IAC 14 and 20 and 40 CFR Part 61 and 63) that become applicable due to the proposed modification.

State Rule Applicability

Entire State Rule Applicability:

There are no entire state rules that become applicable due to the proposed modification.

Individual State Rule Applicability

There are no new individual state rules that become applicable due to the proposed modification.

Changes to the Permit

1. Condition A.2, Source Description:

The source description of Condition A.2 lists the mineral spirits units as follows:

- (4) Mineral sprits machining and washing operations, identified as Unit 4, using one (1) Durr thermal oxidizer as control;

Although there is a new mineral spirits unit that will be added, no changes to the description are necessary because no specific number of units is listed.

2. Condition A.2, Source Description:

The core knockout machine source description of Condition A.2 shall be amended as follows to include the three new core knockout machines:

- (2) Fifteen (15) shell core sand molding machines, twenty (20) aluminum casting machines, one (1) die maintenance area, ~~tenthirteen~~ (103) core knockout machines, and one (1) uncontrolled small tertiary knockout machine, identified as Unit 2, with a maximum capacity of 4,857pounds of aluminum and sand per hour, with the sand molding machines, aluminum casting machines and

the die maintenance area controlled by three (3) baghouses, exhausting to three (3) stacks (EF-49, EF-101, and EF-107), and with the ~~tenthirteen~~ (103) core knockout machines controlled by ten (103) dust collectors;

3. Section D.1, Unit Description:

The unit description of Section D.1 shall be amended as follows to reflect the three new core knockout machines.

- (2) Fifteen (15) shell core sand molding machines, twenty (20) aluminum casting machines, one (1) die maintenance area, ~~tenthirteen~~ (103) core knockout machines, and one (1) uncontrolled small tertiary knockout machine, identified as Unit 2, with a maximum capacity of 4,857 pounds of aluminum and sand per hour, with the sand molding machines, aluminum casting machines and the die maintenance area controlled by three (3) baghouses, exhausting to three (3) stacks (EF-49, EF-101, and EF-107), and with the ~~tenthirteen~~ (103) core knockout machines controlled by ten (103) dust collectors;

4. Section D.2, Unit Description:

The unit description of Section D.2 lists the mineral spirits units as follows:

- (4) Mineral sprits machining and washing operations, identified as Unit 4, using one (1) Durr thermal oxidizer as control;

Although there is a new mineral spirits unit that will be added, no changes to the description are necessary because no specific number of units is listed.

Conclusion

The proposed equipment shall be constructed and operated pursuant to the requirements specified in this proposed minor permit revision (059-15367-00013) and existing FESOP (059-9160-00013).